

Barbara Clarke McCurdy (Admitted *Pro Hac Vice*)
barbara.mccurdy@finnegan.com

Naveen Modi (Admitted *Pro Hac Vice*)
naveen.modi@finnegan.com

Srikala P. Atluri (Admitted *Pro Hac Vice*)
srikala.atluri@finnegan.com

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

901 New York Avenue, N.W.
Washington, D.C. 20001

Telephone: (202) 408-4000
Facsimile: (202) 408-4400

Tina E. Hulse (CA Bar No. 232936)
tina.hulse@finnegan.com

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

3300 Hillview Avenue
Palo Alto, California 94304-1203

Telephone: (650) 849-6600
Facsimile: (650) 849-6666

Attorneys for Plaintiff
Rambus Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RAMBUS INC.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Defendant.

CASE NO. C 10-03736 JSW
(Related Case: C 10-04017 JSW)

STIPULATION RE: CASE SCHEDULE;

**SUPPORTING DECLARATION OF
ROBERT H. FISCHER;**

[PROPOSED] ORDER

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Rambus Inc. (“Rambus”) and Defendant International Business Machines Corporation (“IBM”), through their respective counsel of record, respectfully request, and with the Court’s permission, stipulate to a four-week extension of the current case schedule to allow the parties further time to finalize the settlement agreement and related papers. More specifically, with the Court’s permission, the parties hereby stipulate that the current schedule set forth in the May 31, 2011, Stipulated Order [Dkt. 64] be modified as follows:

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2(a), (b))	June 13, 2011	July 11, 2011
Meet and confer re Joint Claim Construction and Prehearing Statement (Patent L.R. 4-2(c))	June 20, 2011	July 18, 2011
Last day to request leave to designate additional terms for claims construction JSW Standing Order ¶ 4	June 24, 2011	July 22, 2011
Joint Claim Construction and Prehearing Statement (Patent L.R. 4-3) – Includes Expert Testimony. Parties must attach copies of patents, make available file histories to Court for each involved patent	July 8, 2011	August 5, 2011
Completion of Claim Construction Discovery (Patent L.R. 4-3)	August 8, 2011	September 6, 2011
Rambus Opening Claim Construction Brief (Patent L.R. 4-5(a)). 25 page limit	August 22, 2011	September 19, 2011
IBM Responsive Claim Construction Brief (Patent L.R. 4-5(b)). 25 page limit	September 6, 2011	October 4, 2011

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Rambus - Reply Brief and any evidence directly rebutting the supporting evidence (Patent L.R. 4-5(c)). - 15 page limit	September 12, 2011	October 11, 2011
Amended Joint Claim Construction Statement		
Tutorial for the Court	4 October 5 , 2011	1 November 2 , 2011, or any later date, subject to the convenience of the Court's calendar
Claim Construction ("Markman") Hearing (Patent L.R. 4-6).	18 October 19 , 2011	15 November 16 , 2011, or any later date, subject to the convenience of the Court's calendar

By his signature below, counsel for Defendant attests that counsel for Plaintiff concurs in the filing of this stipulation.

Respectfully submitted,

Date: June 10, 2011

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

By /s/ Tina E. Hulse
Tina E. Hulse (CA Bar No. 232936)
tina.hulse@finnegan.com
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
3300 Hillview Avenue
Palo Alto, California 94304-1203
Telephone: (650) 849-6600
Facsimile: (650) 849-6666

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GARRETT & DUNNER, L.L.P.
901 New York Avenue, N.W.
Washington, D.C. 20001
Telephone: (202) 408-4000
Facsimile: (202) 408-4400

Attorneys for Plaintiff,
Rambus Inc.

Dated: June 10, 2011

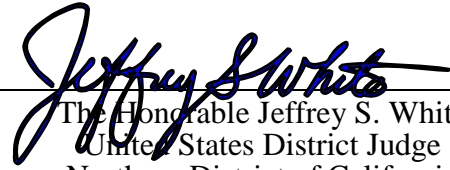
By: /s/ Edward A. Kmett
Edward A. Kmett (SBN: 204374)
FITZPATRICK, CELLA, HARPER & SCINTO
650 Town Center Drive, Suite 1600
Costa Mesa, CA 92626
Telephone: (714) 540-8700
Facsimile: (714) 540-9823

Attorneys for Defendant,
International Business Machines Corporation

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, AS MODIFIED ABOVE

Dated: June 15, 2011


The Honorable Jeffrey S. White
United States District Judge
Northern District of California